

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF: LUIS A. COLON REYES ANA IRMA ROLON SANCHEZ Debtors	CASE NO. 10-8867 CHAPTER 13
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MOTION FOR POST CONFIRMATION MODIFICATION
OF CONFIRMED PAYMENT PLAN UNDER SECTION 1329 AND RULE 9023

TO THE HONORABLE COURT:

COMES NOW DEBTOR through the undersigned attorney and to this Honorable Court respectfully prays and states as follows:

1. Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code in which a payment plan was confirmed.
2. Debtor is hereby requesting to be allowed to modify the confirmed payment plan to provide for funds necessary to pay secured arrears to Doral Bank, Reliable Financial, Island Finance and liquidation value.
3. Debtor is submitting the proposed amended payment plan to provide the necessary funds to pay secured arrears as per disbursement schedule.
4. Debtors request to be allowed to modify their confirmed payment plan to provide for funds necessary to comply with the above stated.
5. With the modified payment plan unsecured creditors will still receive more than they would under a Chapter - 7- liquidation.

WHEREFORE it is respectfully requested from this Honorable Court to enter an Order allowing debtor to modify his confirmed payment plan.

NOTICE IS HEREBY GIVEN TO PARTIES IN INTEREST THAT THEY HAVE TWENTY ONE (21) DAYS TO OBJECT THE PROPOSED MODIFICATION OF THE CHAPTER 13 PLAN AND REQUEST A HEARING. ABSENT GOOD CAUSE UNTIMELY OBJECTIONS SHALL BE DENIED.

CERTIFICATE OF SERVICE: It is hereby certified that this motion has been electronically filed with the Clerk of the Court using the CM/ECF system that will electronically notify parties in interest that have filed a Notice of Appearance and Chapter 13 Trustee Alejandro Oliveras Rivera

In Cayey, Puerto Rico this February 20, 2012.

/s/Miriam A. Murphy Lightbourn

MIRIAM A. MURPHY LIGHTBOURN

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**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. **10-8867****COLON REYES, LUIS A & ROLON SANCHEZ, ANA IRMA**Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: 2/20/2012 Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE <div style="font-family: monospace;"> \$ <u>200.00</u> x <u>12</u> = \$ <u>2,400.00</u> \$ <u>260.00</u> x <u>12</u> = \$ <u>3,120.00</u> \$ <u>400.00</u> x <u>22</u> = \$ <u>8,800.00</u> \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ TOTAL: \$ <u>14,320.00</u> </div> Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: _____ <input type="checkbox"/> Other: _____ Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____		II. DISBURSEMENT SCHEDULE A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>DORAL BANK</u> Cr. <u>ISLAND FINANCE/B/</u> Cr. <u>ReELIABE FINANCI/</u> # <u>3006396</u> # <u>40366801</u> # <u>612-157037</u> \$ <u>3864</u> / <u>141299.00</u> \$ <u>821.00</u> \$ <u>1,176.00</u> 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>ReELIABE FINANCI/</u> <u>DORAL BANK</u> <u>ISLAND FINANCE/B/</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)	
PROPOSED BASE: \$ <u>14,320.00</u> III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,674.00</u>			
Signed: <u>/s/ LUIS A COLON REYES</u> Debtor <u>/s/ ANA IRMA ROLON SANCHEZ</u> Joint Debtor			

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